# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. Nos. 6874 & 7504
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

# **CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "<u>Debtors</u>") hereby certify as follows to the best of my knowledge, information and belief:

- 1. On February 1, 2024, the Debtors filed the Motion of Debtors for Entry of an Order Amending the Order (I) Authorizing and Approving Procedures for the Sale or Transfer of Certain De Minimis Assets and Fund Assets, (II) Approving Assumption, Assignment and Rejection Procedures and (III) Granting Related Relief [D.I. 6874] (the "Motion").
- 2. On February 15, 2024, the Debtors filed the Supplemental Declaration of Bruce Mendelsohn in Support of Motion of Debtors for Entry of an Order Amending the Order (I) Authorizing and Approving Procedures for the Sale or Transfer of Certain De Minimis Assets and Fund Assets, (II) Approving Assumption, Assignment and Rejection Procedures and (III) Granting Related Relief [D.I. 7504] (the "Supplemental Declaration").

{1368.002-W0074502.}

<sup>&</sup>lt;sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

- 3. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the "<u>Informal Comments</u>") from the Office of the United States Trustee for the District of Delaware (the "<u>U.S. Trustee</u>").
- 4. The Debtors have resolved the Informal Comments from the U.S. Trustee by filing the Supplemental Declaration and with no changes to the proposed form of order attached to the Motion (the "Proposed Order"), a copy of which is attached hereto for the Court's convenience as **Exhibit A**.
- 5. It is hereby respectfully requested that the Proposed Order, which shall be uploaded to CM/ECF in accordance with the Court's electronic order processing procedures, be entered at the Court's earliest convenience.

Dated: February 16, 2024 Wilmington, Delaware

#### LANDIS RATH & COBB LLP

# /s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com

-and-

# SULLIVAN & CROMWELL LLP

pierce@lrclaw.com

Andrew G. Dietderich (admitted pro hac vice)
James L. Bromley (admitted pro hac vice)
Brian D. Glueckstein (admitted pro hac vice)
Alexa J. Kranzley (admitted pro hac vice)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com

bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession